

1 GOODWIN PROCTER LLP
2 FORREST A. HAINLINE III (SBN 64166)
3 SUSANNE N. GERAGHTY (SBN 218098)
4 101 California St, Suite 1850
5 San Francisco, California 94111
6 415.733.6000
7 415.677.9041 (facsimile)
8 sgeraghty@goodwinprocter.com

6 Attorneys For Defendants
7 CORNING INCORPORATED,
WORLD KITCHEN, INC., and
WKI HOLDING COMPANY, INC.

DEBORAH NEBENZAHL,
Plaintiff,
vs.
CORNING INCORPORATED, WORLD
KITCHEN, INC., WKI HOLDING
COMPANY, INC., and DOES 1 through 100
inclusive,
Defendants.

Case No. C 06-00778 SC

**STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE TO
COMPLETE MEDIATION**

IT IS HEREBY STIPULATED by and between plaintiff Deborah Nebenzahl ("plaintiff") and defendants Corning Incorporated, World Kitchen, Inc. and WKI Holding Company, Inc. (collectively, "defendants"), through their attorneys of record, to continue the deadline to complete mediation from August 24, 2006 to October 27, 2006.

This is the parties' first request to continue the deadline to complete mediation. Defendants served discovery on June 30, 2006, and plaintiff's responses are due at the beginning of August 2006. Defendants intend to subpoena documents from third parties by August 31, 2006, and to take necessary depositions, including plaintiff's deposition, by September 30, 2006. The parties believe that completing this discovery, including plaintiff's deposition, is necessary in order to enhance the prospects for settlement at the mediation and to ensure that the parties are able to effectively

1 participate in the mediation. The parties intend to schedule the mediation to take place before
2 October 27, 2006.

3 The parties have advised the court-appointed mediator, Mr. Arnold Haimes, of the proposed
4 schedule and he does not object. The parties have confirmed that Mr. Haimes is generally available
5 to conduct the mediation in October 2006.

6 The requested continuance will not alter the date of any other event or deadline already fixed
7 by court order.

8 Dated: August 1, 2006

MANNION & LOWE
A Professional Corporation

10 By: 

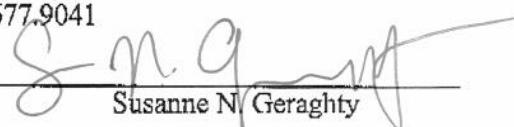
E. Gefard Mannion

11 Attorneys for Plaintiff
12 DEBORAH NEBENZAHL

14 Dated: August 1, 2006

GOODWIN PROCTER LLP

15 Forrest A. Hainline III (SBN 64166)
16 Susanne N. Geraghty (SBN 218098)
17 101 California St, Suite 1850
18 San Francisco, California 94111
19 415.733.6000
415.677.9041

By: 

Susanne N. Geraghty

20 Attorneys For Defendants
21 CORNING INCORPORATED,
WORLD KITCHEN, INC., and
WKI HOLDING COMPANY, INC

22 **ORDER**

23 PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO
24 ORDERED that the deadline to complete mediation in this action shall be continued from August
25 24, 2006 to October 27, 2006.

26 Dated: August 2, 2006

27
28 Stipulation and [Proposed] Order Continuing Deadline to Complete Mediation

